

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ADAM WENZKE
PLAINTIFF

v.

CORRECTIONAL MEDICAL
SERVICES ET, AL.
DEFENDENTS

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) CIV. ACTION No. 07-504-SLR
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NOTICE OF INTERROGATORY

PLEASE TAKE NOTICE THAT PURSUANT TO RULE 33, FED. R. CIV. P. THE PLAINTIFF SUBMITS THE FOLLOWING INTERROGATORIES TO THE DEFENDENT CORRECTIONAL MEDICAL SERVICES INC. (C.M.S.) TO ANSWER EACH OF THE ATTACHED INTERROGATORIES IN WRITING UNDER OATH, WITHIN 30 DAYS OF SERVICE.

July 29, 2008
DATE

ADAM WENZKE #182595
PLAINTIFF
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DE 19977

INTERROGATORIES - C.M.S.

- 1) EXPLAIN AND DESCRIBE YOUR DUTIES AS THE MEDICAL CARE PROVIDER AT H.R.V.C.I AND D.C.C. ?
- 2) EXPLAIN AND DESCRIBE THE ACTION YOU TOOK WHEN YOU WERE OFFICIALLY INFORMED OF THE PLAINTIFF'S MEDICAL CONDITION ?
- 3) EXPLAIN AND DESCRIBE IF YOU THINK YOUR COMPANY WAS GIVING THE PLAINTIFF THE GENERALLY ACCEPTED PROFESSIONAL STANDARDS OF MEDICAL CARE AND THE STANDARDS OF THE NATIONAL COMMISSION ON CORRECTIONAL HEALTH CARE ?
- 4) EXPLAIN AND DESCRIBE IF IT'S C.M.S.'S POLICY OR CUSTOM TO KEEP PLAINTIFF ON MASSIVE AMOUNTS OF TYLENOL FOR 4 YEARS KNOWING HE WAS CO INFECTED WITH TWO DIFFERENT TYPE STRAINS OF THE HEPATITIS C VIRUS ?
- 5) EXPLAIN AND DESCRIBE ANY SHORT AND LONG TERM SIDE EFFECTS THAT YOU ADVISED PLAINTIFF ABOUT IF HE TOOK MASSIVE AMOUNTS OF TYLENOL FOR A LONG PERIOD OF TIME.
- 6) EXPLAIN AND DESCRIBE WHY C.M.S. CONTINUED THIS EGREGIOUS FORM OF TREATMENT FOR SO LONG WHEN THERE WERE NUMEROUS COMPLAINTS IN HIS MEDICAL RECORDS INFORMING YOU THAT THE TYLENOL WAS NOT WORKING

- 7) EXPLAIN AND DESCRIBE WHY NOBODY RESPONDED TO PLAINTIFFS MEDICAL GRIEVANCE APPEAL THAT HE WON FROM THE BUREAU CHIEF RICHARD KEARNEY ON APRIL 25, 2007?
- 8) EXPLAIN AND DISCRIBE AFTER PLAINTIFF NOTIFIED THE MEDICAL DEPARTMENT NUMEROUS TIMES OF HIS PAIN AND SUFFERING WHY YOU FAILED TO USE YOUR AUTHORITY TO HELP HIM?
- 9) EXPLAIN AND DESCRIBE IF YOU INVESTIGATED PLAINTIFFS CLAIMS OF SEVERE PAIN AND SUFFERING AND WHAT YOU DID ABOUT THE NUMEROUS CLAIMS?
- 10) EXPLAIN AND DESCRIBE IF C.M.S HAS EVER HIRED UNDER QUALIFIED OR UNLICENCED MEDICAL PERSONELL TO SAVE MONEY?
- 11) EXPLAIN AND DESCRIBE THE TRAINING THAT ALL DEFENDANTS RECIEVED WHEN THEY WERE HIRED BY C.M.S. TO WORK IN A PRISON MEDICAL ENVIORMENT?
- 12) EXPLAIN AND DESCRIBE IF YOU HAVE A POLICY OR CUSTOM BEFORE YOU TREAT THE INMATES TO GET THIER INFORMED COTISENT?
- 13) EXPLAIN AND DESCRIBE THE RISKS THAT YOU DELIGATED DOWN TO YOUR SUBORDINATS CONCERNING PLAINTIFFS MEDICAL TREATMENT OF TESTICULAR CYSTS AND POSSIBLE INTERMITTENTORSION AND HIS OPTIONS OF TREATMENT?

- 14) EXPLAIN AND DESCRIBE ANY INCENTIVES OR BONUSES THAT YOUR COMPANY KNOWS ABOUT OR OFFERS TO MINIMIZE HIGH COST TREATMENTS ESPECIALLY THOSE WHO REQUIRE HOSPITALIZATION OR THE CONSULTATION OF SPECIALISTS?
- 15) EXPLAIN AND DESCRIBE WHY THAT AFTER 2 OUT OF 3 ULTRA SOUNDS REVIEWED PAINFUL BILATERAL CYSTS AND THEY WERE GETTING BIGGER THAT NO ONE EVEN ATTEMPTED TO ~~OFFER~~ HELP TO THE PLAINTIFF EXCEPT THE SAME OLD TYLENOL TREATMENT?
- 16) EXPLAIN AND DESCRIBE IF ITS GENERAL STANDARD PRACTICE TO IGNORE THE INMATES COMPLAINTS OR MOVE INMATES TO ANOTHER FACILITY OR SIMPLY CHECK THEIR MAX OUT DATE AND DELAY IT UNTIL THEN TO AVOID TREATING THEM?
- 17) IN YOUR OPINION EXPLAIN AND DESCRIBE IF YOU THINK IT'S SAFE FOR A PATIENT CO-INFECTED WITH TWO DIFFERENT TYPES STRAINS OF THE HEPATITIS C VIRUS TO BE GIVEN MASSIVE AMOUNTS OF TYLENOL FOR OVER 4 YEARS?
- 18) EXPLAIN AND DESCRIBE IF YOUR COMPANY HAS EVER TRANSFERRED INMATES TO DIFFERENT FACILITIES BECAUSE THEY COMPLAINED TO MEDICAL TOO MUCH OR JUST TO AVOID TREATING THEM?

RESPECTFULLY,

Adam Wenzke
PLAINTIFF

July 29, 2008
DATE

ADAM WENZKE #182595
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DE 19977

CERTIFICATE OF SERVICE

I ADAM WENZKE, HEREBY CERTIFY THAT I HAVE SERVED A TRUE COPY OF THE 1 NOTICE OF
INTERROGATORIES UPON THE FOLLOWING PARTIES:

1) DEPARTMENT OF JUSTICE
ORNELIA M. WATERS
820 N. FREUCH ST
Wilm, DE 19801-3509

2) OFFICE OF THE CLERK
U.S. DISTRICT COURT
844 N. KING ST. Lockbox 18
Wilm, DE 19801-3570

By PLACING SAME IN A SEALED ENVELOPE, AND DEPOSITING SAME IN THE U.S. MAIL AT THE DELAWARE CORRECTIONAL CENTER, SMYRNA DE 19977

ON THIS 29 DAY OF JULY 2008

Adam Wenzke